

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

JOHN GILBERT,)
)
Plaintiff,)
v.)
)
APC NATCHIQ, INC.,)
)
Defendant.)
) Case No. 3:03-CV-00174-RRB
)

**UNOPPOSED MOTION TO ACCEPT LATE FILING OF REPLY TO PLAINTIFF'S
OPPOSITION TO DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT RE
LIQUIDATED DAMAGES AT DOCKET # 79**

Defendant, APC Natchiq, Inc., by and through its attorneys, Delisio, Moran, Geraghty & Zobel, PC, hereby moves the court to accept the late filing of its reply to plaintiff's Opposition to Defendant's Motion for Partial Summary Judgment re Liquidated Damages. The respective motion was filed at docket no. 79. Defendant has conferred with plaintiff's counsel who has agreed to grant an extension and allow the late filing on or before **October 23, 2006.**

DELLISIO MORAN
GERAGHTY & ZOBEL, P.C.

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00106106.doc - Unopposed Mtn. for Reply re: Liquidated Damages

DATED this 16th day of October, 2006, at Anchorage, Alaska.

DeLISIO MORAN GERAGHTY & ZOBEL
Attorneys for Defendant,
APC Natchiq, Inc.

/s/ Patricia L. Zobel

By: _____

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This is to certify that a true copy of the foregoing was served via electronic service or U.S. Mail this 16th day of October, 2006, to the following:

Kenneth L. Covell, Esq.
712 Eighth Avenue
Fairbanks, AK 99701

/s/ Leah Prince

By: _____
Leah Prince